

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GARY KOOPMANN, TIMOTHY KIDD and	:	Civ. Action No: 15-cv-07199-JMF
VICTOR PIRNIK, Individually and on Behalf of	:	
All Others Similarly Situated,	:	
	:	
	:	<u>CLASS ACTION</u>
Plaintiff(s),	:	
	:	
v.	:	
	:	
FIAT CHRYSLER AUTOMOBILES N.V.,	:	
FCA US, LLC, SERGIO MARCHIONNE,	:	
RICHARD K. PALMER, SCOTT	:	
KUNSELMAN, MICHAEL DAHL, STEVE	:	
MAZURE and ROBERT E. LEE	:	
	:	
Defendants.	:	

DECLARATION OF MICHAEL J. WERNKE

I, Michael J. Wernke, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner of the law firm of Pomerantz LLP, appointed by the Court as Lead Counsel in this action. I am personally involved in the representation of Lead Plaintiffs and the putative class, and submit this declaration in opposition to Defendants' Motion To Dismiss The Emissions-Related Claims From The Fourth Amended Complaint. I have personal knowledge of the matters set forth herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of the LexisNexis transcript of Fiat Chrysler's Automobiles NV, July 27, 2017 Q2 2017 Earnings Call.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Thompson Reuters transcript of Fiat Chrysler's Automobiles NV, July 27, 2017 Q2 2017 Earnings Call.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of September 2017, in New York, NY.

/s/ Michael J. Wernke
Michael J. Wernke